

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR VIOLATIONS
OF THE FEDERAL CONTROLLED SUBSTANCES ACTS**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.	
v.	*	SECTION:	
MARKELL LEBLANC	*	VIOLATIONS:	21 U.S.C. § 841(a)(1)
KIM M. JONES			21 U.S.C. § 846
KEVIN A. ALLEN	*		18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNT 1

THE COCAINE BASE CONSPIRACY

Beginning at a time unknown to the Grand Jury, but prior to June 11, 2008, and continuing until on or about the date of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants **MARKELL LEBLANC, KIM M. JONES and KEVIN A. ALLEN**, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the grand jury, to distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 2

THE HEROIN CONSPIRACY

Beginning at a time unknown to the Grand Jury, but prior to July 1, 2008, and continuing until on or about the date of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants **MARKELL LEBLANC and KIM M. JONES**, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the grand jury, to distribute less than one-hundred (100) grams of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

COUNT 3

On or about June 11, 2008, in the Eastern District of Louisiana, the defendants **KIM M. JONES and KEVIN A. ALLEN**, did knowingly and intentionally distribute less than five (5) grams of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

On or about June 12, 2008, in the Eastern District of Louisiana, the defendant **KEVIN A. ALLEN**, did knowingly and intentionally distribute less than five (5) grams of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

On or about June 17, 2008, in the Eastern District of Louisiana, the defendants **KIM M. JONES**, did knowingly and intentionally distribute less than five (5) grams of cocaine base

("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

On or about June 17, 2008, in the Eastern District of Louisiana, the defendant **KEVIN A. ALLEN**, did knowingly and intentionally distribute less than five (5) grams of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

On or about June 17, 2008, in the Eastern District of Louisiana, the defendant **KEVIN A. ALLEN**, did knowingly and intentionally distribute five (5) grams or more of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 8

On or about June 19, 2008, in the Eastern District of Louisiana, the defendant **KEVIN A. ALLEN**, did knowingly and intentionally distribute five (5) grams or more of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 9

On or about July 1, 2008, in the Eastern District of Louisiana, the defendants **MARKELL LEBLANC and KIM M. JONES**, did knowingly and intentionally distribute five (5) grams or more of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 10

On or about July 1, 2008, in the Eastern District of Louisiana, the defendants **MARKELL LEBLANC and KIM M. JONES**, did knowingly and intentionally distribute less than one-hundred (100) grams of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11

On or about July 2, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute less than five (5) grams of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12

On or about July 2, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute less than one-hundred (100) grams of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 13

On or about July 3, 2008, in the Eastern District of Louisiana, the defendant **KIM M. JONES**, did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 14

On or about July 3, 2008, in the Eastern District of Louisiana, the defendant **KIM M.**

JONES, did knowingly and intentionally distribute less than one-hundred (100) grams of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 15

On or about July 9, 2008, in the Eastern District of Louisiana, the defendants **MARKELL LEBLANC**, did knowingly and intentionally distribute less than one-hundred (100) grams of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 16

On or about July 9, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 17

On or about July 10, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)

COUNT 18

On or about July 15, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States

Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 19

On or about July 23, 2008, in the Eastern District of Louisiana, the defendant **MARKELL LEBLANC**, did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 19 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1 through 19 defendants, **MARKELL LEBLANC, KIM M. JONES and KEVIN A. ALLEN**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violation(s) and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 through 19 of this Indictment.

3. If any of the above described property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

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New Orleans, Louisiana
January 23, 2009